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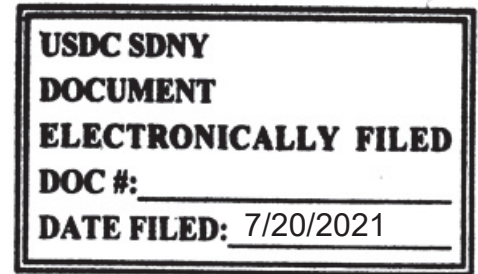
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July 19, 2021

VIA ECF

Hon. Robert W. Lehrburger, U.S.M.J.
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 18D
New York, NY 10007-1312

Re: Perez, et ano. v. Milea Truck Sales Corp, et al.
Case No: 1:21-cv-1100 (JPC) (RWL)
Our File No.: 155-2020



Dear Judge Lehrburger:

This office represents the Defendants Milea Truck Sales Corp. (hereinafter ("Milea"), MTS Realty of Queens, Inc. (hereinafter "MTS") (Milea and MTS collectively hereinafter the "Corporate Defendants"), and Barry Milea (hereinafter the "Individual Defendant") (the Corporate Defendants and the Individual Defendant collectively hereinafter the "Defendants") in the above-referenced case. See Docket Entry 5. Defendants write jointly with the Plaintiffs to respectfully request an extension of time until Wednesday, July 21, 2021 to jointly file either a letter of no more than three pages with authority supporting the propriety of the proposed non- disparagement provision in a wage-and-hour case such as this one, or a revised agreement or amendment to the agreement that modifies the non- disparagement clause (a) to be mutual and/or (b) to allow for truthful statements about the case and underlying facts without limitation to particular circumstances.

Pursuant to ¶ 1(F) of this Court's Individual Practices in Civil Cases (hereinafter "Individual Rules"), the parties submit that: (i) the original deadline to act in the foregoing manner was on July 15, 2021; (ii-iii) there have been no previous requests for an extension of this deadline; and (iv) opposing counsel consents to and joins in this request.

The parties respectfully submit that good cause and excusable neglect exists warranting an extension of time for them to respond to this Court's Order concerning the parties' joint letter motion for settlement approval as the parties need additional time to consult with their clients concerning this Court's July 15, 2021 Order. The parties respectfully submit that the great likelihood is they will submit a revised agreement or amendment to the agreement that modifies the non- disparagement clause to be both mutual and to allow for truthful statements about the case and underlying facts without limitation to any particular circumstances.

Accordingly, Defendants submit that good cause and excusable neglect has been established warranting that this Court grant the requested extension of the Defendants' deadline to answer. See Fed. R. Civ. P. 6(b)(1)(B).

Defendants thank this honorable Court for its time and attention to this case.

Dated: Lake Success, New York
July 19, 2021

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/ Emanuel Kataev, Esq.

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SO ORDERED:

7/20/2021

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE

